

ORIGINAL

*Steve A. Schum*  
CLERK OF THE COURT

1 TRO  
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10 *Attorneys for Plaintiffs*

11 DISTRICT COURT

12 CLARK COUNTY, NEVADA

13 CONSIPIO HOLDING, BV, a corporation  
14 organized under the laws of The  
15 Netherlands; ILAN BUNIMOVITZ, an  
16 individual; TISBURY SERVICES INC., a  
17 corporation organized under the laws of the  
18 British Virgin Islands;

19 Plaintiffs,

20 vs.

21 PRIVATE MEDIA GROUP, INC., a Nevada  
22 corporation; DOE INDIVIDUALS 1 through  
23 10; and ROE BUSINESS ENTITIES 11  
24 through 20, inclusive,

25 Defendants.

26 Case No.: A-10-622802-B  
27 Dept. No.: XI

28 TEMPORARY RESTRAINING ORDER

29 On August 11, 2010, the Court entered an Order directing Defendant PRIVATE MEDIA  
30 GROUP, INC. ("PRVT") to appear and Show Cause Why a Temporary Restraining Order  
31 Should Not Be Issued in this matter. The hearing on the Order to Show Cause was held August  
32 13, 2010. Plaintiffs CONSIPIO HOLDING BV, ILAN BUNIMOVITZ and TISBURY  
33 SERVICES INC. (collectively "Plaintiffs") appeared by and through their counsel Charles H.  
34 McCrea, Jr. and Meredith L. Markwell of the law firm Lionel Sawyer & Collins and Defendant

1 PRVT appeared by and through its counsel Robert A. Dotson of the law firm Laxalt & Nomura,  
2 Ltd. The Court finds that PRVT was duly served with the Summons, Verified Complaint, *Ex*  
3 *Parte* Motion for Temporary Restraining Order and Motion for Preliminary Injunction and  
4 Appointment of a Receiver ("Motion for Temporary Restraining Order") and Order to Show  
5 Cause on August 11, 2010 as directed in the Order to Show Cause.  
6

7 The Court has reviewed the Verified Complaint, the Motion for Temporary Restraining  
8 Order and attached Declarations and heard the arguments of counsel. Based thereon, Court  
9 preliminarily finds: (A) Plaintiffs' Motion for Temporary Restraining Order should be granted;  
10 (B) Plaintiffs have established that there is a reasonable probability of success on the merits of  
11 their claims, that Plaintiffs and the shareholders of PRVT will suffer immediate, irreparable harm  
12 unless the Temporary Restraining Order is issued, and that the balance of hardships between the  
13 parties concerning the Temporary Restraining Order favors Plaintiffs; and (C) pursuant to NRCP  
14 65(c), Plaintiffs should be required to post security for the Temporary Restraining Order in the  
15 amount of \$25,000.00.  
16

17 Accordingly, it is hereby

18 ORDERED, ADJUDGED AND DECREED that Plaintiffs' Motion for Temporary  
19 Restraining Order is hereby GRANTED.  
20

21 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that PRVT (including its  
22 subsidiaries and affiliates) and PRVT's officers, agents, servants, employees and attorneys and  
23 other persons who are in active concert or participation with anyone described in NRCP  
24 65(d)(2)(A) or (B) are immediately restrained from holding or conducting any Special Meeting  
25 of its Board of Directors without prior order from this Court, which may be sought on shortened  
26 time pursuant to EDCR 2.26 with prior notice to all parties and counsel of record.  
27

28 IT IS FURTHER ORDERED ADJUDGED AND DECREED that that PRVT (including

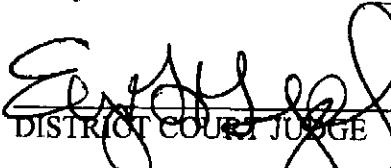
1 its subsidiaries and affiliates) and PRVT's officers, agents, servants, employees and attorneys  
2 and other persons who are in active concert or participation with anyone described in NRCP  
3 65(d)(2)(A) or (B) shall be restrained from (i) issuing any additional shares of stock (common or  
4 preferred), (ii) incurring any additional debt (outside of the ordinary course of business), (iii)  
5 disposing of any business assets (outside of the ordinary course of business), (iv) making any  
6 loans to any officer or director of PRVT or any person or entity owned or controlled by any such  
7 officer or director, (v) closing, liquidating, transferring or withdrawing funds from (other than in  
8 the ordinary course of business) any bank or brokerage account, (vi) paying any bonus to any  
9 officer or director of PRVT, and (vii) undertaking any other act or transaction that is not in the  
10 ordinary course of business, without the prior approval of a majority of the disinterested  
11 members of the Board of Directors at a duly noticed regular meeting of the Board of Directors or  
12 at a Special Meeting of the Board of Directors held in compliance with the requirements of this  
13 Temporary Restraining Order as set forth above.

14 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiffs are required  
15 to post security for the Temporary Restraining Order in the amount of \$25,000.00.

16 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiffs' Motion for  
17 Preliminary Injunction and Appointment of a Receiver shall be set for hearing before the above-  
18 captioned Court on Friday, September 3, 2010 at the hour of 9:00 A.M. The parties are to submit  
19 and exchange a list of proposed live witnesses and copies of any proposed exhibits and affidavits  
20 or declarations not previously attached to any of the motion papers by noon on September 1,  
21 2010. If there are any objections to any affidavit or declaration submitted by PRVT in response  
22 to the Motion for Temporary Restraining Order, such objections shall be submitted by noon on  
23 September 1, 2010. Any Trial Briefs shall be submitted to the Court no later than noon on  
24 September 2, 2010.

1 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that this Temporary  
2 Restraining Order shall remain in effect until the conclusion of the evidentiary hearing scheduled  
3 to commence on September 3, 2010, counsel for PRVT having stipulated at the hearing of this  
4 matter that it could remain in effect beyond the time specified in NRCP 65(b).

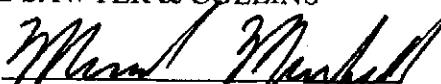
5 DATED and DONE this 13 day of August 2010 at the hour of \_\_\_\_\_.M.  
6

7   
8 DISTRICT COURT JUDGE



9 Respectfully submitted,

10 LIONEL SAWYER & COLLINS

11 By: 

12 Charles H. McCrea, Jr. (NSB #104)  
13 Meredith L. Markwell (NSB #9203)

14 *Attorneys for Plaintiffs*

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